

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10718-RGS

---

STEVEN HORNE and )  
RONALD BROWN, )  
 )  
 PLAINTIFFS )  
 )  
 v. )  
 )  
 CITY OF BOSTON, )  
SGT. ERIC BULMAN, and )  
SGT. JOHN DAVIN, )  
 )  
 DEFENDANTS )  

---

**SECOND JOINT MOTION TO EXTEND DEADLINES**

The parties hereby jointly move to extend the deadlines in the above matter as follows:

1. All demands for discovery (including, without limitation, all interrogatories, request for admissions and requests for production of documents and things) shall be served and all depositions shall be taken by **November 30, 2005**.

The Parties submit that all Parties will, however, be under a continuing obligation to respond to discovery and supplement previous responses to the extent required under the Rules of Civil Procedure.

2. Plaintiffs' expert reports to be served by **February 28, 2006** and Defendants' expert reports to be served by **March 31, 2006**.

3. Depositions of experts to be completed by **April 28, 2006**.

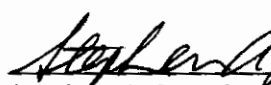
4. All motions pursuant to F.R.C.P. 56 shall be served and filed by **May 31, 2006 and responses thereto by June 30, 2006.**

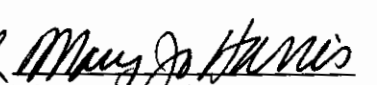
In all other respects, the prior orders of the Court shall remain in force and effect.

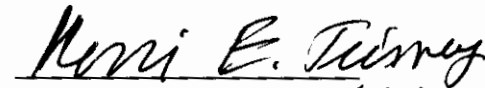
In support of this joint motion the parties state that they are diligently engaged in, and need more time to complete, discovery and depositions. Schedules for counsel for both parties have included, and will include, vacations and trials. Counsels' schedules have been demanding which has made it difficult to arrange depositions and complete discovery, especially with the number of witnesses. This is the second request for an extension of time for discovery. No party will be prejudiced by the extension.

PLAINTIFFS  
By their attorney,

DEFENDANTS,  
By their attorneys,

  
Stephen A. Roach  
BBO No. 542138  
Roach & Wise, LLP  
31 State Street  
Boston, MA 02109  
(617) 723-2800

  
Mary Jo Harris  
BBO No. 561484  
Morgan, Brown & Joy, LLP  
200 State Street  
Boston, MA 02109  
(617) 523-6666

  
Kerri E. Tierney  
BBO No. 634679  
Assistant Corporation Counsel  
Boston Police Department  
Office of the Legal Advisor  
One Schroeder Plaza  
Boston, MA 02120  
(617) 343-4550

Date: July 1, 2005